

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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BRUCE A. BLAKEMAN, in his capacity as  
County Executive of the County of Nassau,  
COUNTY OF NASSAU, MARC MULLEN as  
parent and natural guardian of K.E.M., an infant  
under the age of eighteen years, and JEANINE  
MULLEN, as parent and natural guardian  
of K.E.M., an infant under the age of eighteen years,

Case No. 2:24-cv-01655

**DECLARATION**

Plaintiffs,

-against-

LETITIA JAMES, as Attorney General of the  
State of New York, STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL, and  
STATE OF NEW YORK,

Defendants.

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**Victoria LaGreca**, an attorney duly admitted to practice before all the Courts of the State of New York and in the United States District Court for the Eastern District of New York, declares under penalty of perjury that the following is true and correct pursuant to 28 U.S.C. § 1746:

1. I am the attorney of record for the Plaintiffs Bruce A. Blakeman, in his capacity as County Executive of the County of Nassau, and the County of Nassau. As such I am fully familiar with all the prior proceedings in the above-referenced matter. This familiarity is based upon discussions with my clients, the documents, books, records and files, if any, in my possession.

2. I am submitting this Declaration setting forth the attached Exhibits as true and accurate documents, and in support of the Plaintiff's application for a temporary restraining order, preliminary injunction, and for such other and further relief as to this Court deems just and proper.

3. Attached hereto as Exhibit 1 is a true copy of Executive Order 2-2024, executed by County Executive Bruce A. Blakeman on February 22, 2024.

4. Attached hereto as Exhibit 2 is a true copy of a “Cease and Desist Notification” dated March 1, 2024 received from Defendant Letitia James through the New York State Office of the Attorney General.

5. Attached hereto as Exhibit 3 is a true copy of the Affidavit of Bruce A. Blakeman, duly sworn to on March 7, 2024.

6. Notice of the Plaintiff’s intention to bring the instant order to show cause was faxed to the New York State Attorney General’s Office on March 6, 2024 at 8:17 p.m. to (518) 650-9401. Notice was additionally personally served upon the Attorney General’s Office on March 7, 2024 at the Attorney General’s Office in Albany and in Manhattan.

Dated: Mineola, New York  
March 7, 2024

John L. Hiller  
Chief Deputy County Attorney

By: /s/ Victoria LaGreca  
Victoria LaGreca  
*Deputy County Attorney*  
1 West Street, 2<sup>nd</sup> Floor  
Mineola, New York 11501  
(516) 571-3056